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June 6, 2022

Via Electronic Mail:

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 1007

**Re: In Re: New York City Policing During Summer 2020 Demonstrations
Civ. Dkt. No.: 1:20-CV-8924 (CM) (GWG)**

**Rolon, et al., v. City of New York, et al.,
Civ. Dkt. No.: 1:21-CV-2548 (CM)**

Dear Hon. Judge McMahon,

We represent the Plaintiffs in *Rolon, et al., v. City of New York, et al.*, and write in response to the Defendant City's letter motion dated June 03, 2022. See Dkt No. 576.

We write to clarify the discussions held with the City regarding our consent to an extension of the City's time to respond to the complaint, as the letter does not reflect the extent of the undersigned's consent. The undersigned confirmed with Assistant Corporation Counsel Omar Siddiqui that Defendant City would answer and not move by motion to dismiss the complaint, in consideration for Plaintiffs' consent to an extension. As such, the parties had an agreement that the Defendants would file an answer in exchange for Plaintiffs' consent, and no motion to dismiss would be filed by the Defendants.

Furthermore, Plaintiffs did not consent to 45 days ending July 11, 2022. Since this particular matter is delayed in discovery, our position is that the Defendants' time to answer runs from the date the stay in the matter was dissolved, May 11, 2022. See Dkt. No. 538. Therefore, the City would file its Answer by June 27, 2022.

We last heard from the ACC that he was to speak to his supervisors regarding the above and update the undersigned. The next thing we received instead was the instant letter motion seemingly indicating unconditional consent by Plaintiffs that does not exist.

Finally, Defendant Police Officers Wells and Fierro were served on September 16, 2021, and July 6, 2021. During our discussion, Plaintiffs advised Defendant City that these officers were properly served.

We thank the Court for its time and attention to this matter.

Very truly yours,

/s/

Tahanie A. Aboushi

cc: All counsel of Record via ECF